EEB Work Programme & Budget 2015
The EEB provides an environmental voice for European citizens, standing for environmental justice, sustainable development and participatory democracy. Our aim is to promote a healthy environment and rich biodiversity throughout the EU and beyond.

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Editor responsible: Jeremy Wates

European Environmental Bureau (EEB)
Boulevard de Waterloo 34 | B-1000 Brussels | Belgium
Tel.: +32 (0)2 289 1090 | Fax: +32 (0)2 289 1099
E-mail: eeb@eeb.org

AN INTERNATIONAL NON-PROFIT ASSOCIATION
ASSOCIATION INTERNATIONALE SANS BUT LUCRATIF

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Our vision

The European Environmental Bureau's vision is of a world in which:

• All people of present and future generations are able to enjoy a rich, clean and healthy environment, where prosperity and peace are secured for all;

• Responsible societies respect the carrying capacity of the planet and preserve it for future generations, including its rich biodiversity;

• Effective environmental policies and sustainable development have priority over short-term objectives that only serve the current generation or certain sections of society.
INTRODUCTION

The European Environmental Bureau (EEB) aims to promote environmental justice, sustainable development and participatory democracy throughout the European Union and beyond. As the largest environmental citizens’ association in Europe, we bring together more than 140 environmental organisations from some 30 countries, with a combined membership of 15 million environmentally concerned citizens.

At the mature age of 40, the EEB’s role has never been more relevant than it is today. Despite mounting evidence of society’s failure to reverse the slide towards irreversible climate change, prevent biodiversity loss or face up to the impending resource crisis, environmental issues continue to take low priority in government and corporate decision-making. Global environmental conflicts are on the increase. The economic crisis, instead of being seized on as an opportunity to make the transition to a green and fair economy, has been mistakenly used as an excuse to attempt to weaken environmental protection measures and defend the outdated, polluting, resource-inefficient development paradigm. The new Juncker Commission has embraced this outdated agenda with an unprecedented ideological zeal and seems determined to shut down environmental policy making as far as possible.

Bilateral trade and investment negotiations between the EU and the US are now playing an important role on the political agenda with potentially very significant and mostly negative consequences for the further development of the EU’s environment-related policies.

The EEB work programme for 2015 sets out our commitment to continue working on a broad range of issues in the coming year in order to hold the line on existing policies, secure a good outcome on pending proposals and ultimately turn the rhetoric of a greener and fairer economy into a reality. These include:

- Major thematic areas such as climate change, energy, agriculture, biodiversity, air, water, chemicals, pollution, products, resources and waste;
- Horizontal topics such as sustainable development, implementation and enforcement of environmental law, policy coherence, greening the economy and the implementation of the Seventh Environmental Action Programme;
- Emerging and/or neglected issues, such as soil, nanotechnology and noise;
- Processes extending beyond the borders of the EU, such as follow up to the Rio+20 process, including the sustainable development goals (SDGs), post-2015 process and 10-Year Framework of Programmes on Sustainable Consumption and Production (10YFP SCP); the Minamata Treaty on Mercury; the Aarhus Convention; and the OECD’s environment-related work.

At the same time, we will continue to build and strengthen the organisation, including the membership network. Following the decision at the 2013 AGM to expand the EEB’s geographical scope, we are pleased to welcome several new full members from the Republic of Moldova and Ukraine.

Within the environmental movement, the EEB is well placed to articulate the concerns of the European public over the main environmental challenges facing our region and indeed our planet. For many topics, we have cutting-edge expertise within the EEB staff, able to engage in the nitty-gritty details. For others, we rely on the extensive knowledge within our membership network – knowledge which is applied and further developed within some twenty subject-specific working groups. We also benefit from close collaboration with other specialised NGO networks to ensure that we remain abreast of the latest developments. In particular on issues such as climate change, marine protection, transport and fiscal reform we will seek to strengthen our cooperation with CAN-Europe, Seas at Risk, Transport and Environment and Green Budget Europe.

While the EEB was established around environmental concerns, we remain committed to promoting the social dimension of sustainable development. This is expressed not least through our active involvement in the Spring Alliance, a collaboration with partners from trade unions and social and development organisations working at European level.
OVERARCHING POLICY FRAMEWORK

Achieving a timely transition to a sustainable economic model in Europe will require not only increased ambition in relation to specific policy initiatives addressing detailed topics but also a high-level policy framework which is supportive of such a transition. The EU’s current high-level policy framework is unduly based on short-term economic considerations and has failed to put sustainable development at the heart of the EU’s mission or look beyond GDP as the primary indicator of success.

Juncker Commission

The start of the new Juncker Commission has been marked by an unprecedented attack on environmental protection driven by pursuit of an outdated growth-and-jobs agenda – through the converting of the dedicated posts of Environment Commissioner and Commissioner for Climate Action into part-time roles; through the complete absence of environment outside of climate change and GMOs in the new political priorities; through the introduction of a filtering system which will discourage the issuing of any new legislative initiatives that do not fit with those political priorities; through re-examination of existing legislation under REFIT to see if it can be ‘modernised’; i.e. better aligned with the growth-and-jobs agenda; and through considering the withdrawal of certain legislative proposals that are already going through co-decision, under the so-called ‘political discontinuity’ principle. With regard to this last point, in one of the new Commission’s first moves, it targeted two of the most significant environmental proposals to emerge from the Barroso II Commission, the packages on air and waste, for potential withdrawal.

Under this new regime, the development of new environmental policies that will seek to improve environmental protection will become highly unlikely in the next 5 years and if at all, only through strong and sustained public pressure. This is putting a challenge to the EEB’s ways of working across all of its priority areas. It will mean first and foremost fending off any roll back of existing standards as for example in the case of the Birds and Habitats Directive. Second, it will mean ensuring that negotiations on proposals that are currently in co-decision, such as air and waste, will be brought to a satisfactory conclusion. Finally it will require a stronger cooperation with the grassroots level and to move to an agenda setting roles on key issues.

Activities:

➤ Step up high-level engagement with the EU institutions on the horizontal question of the status of environment within the Commission decision-making processes, both as the EEB alone and in collaboration with other partners (G10, Spring Alliance, topic-based coalitions, etc);
➤ Increasing mobilisation at Member State level through the EEB members.

Seventh Environmental Action Plan (7EAP)

In 2015 the EEB will seek the continued rapid implementation of the 7th EAP, especially by ensuring the support of the new European Parliament and Commission.

Activities:

➤ Monitor and push for implementation of the 7EAP

Europe 2020

Europe 2020, the European Union’s ten-year growth strategy, has reflected and at the same time influenced the prevailing political thinking around the EU’s response to the euro-crisis. While the strategy purports to promote a form of growth which is ‘smart, sustainable and inclusive’, it does not promote a real transition away from the current unsustainable economic development paradigm. A review of the strategy was launched in 2014 and is expected to
continue in 2015. The EEB will continue to contribute to the review process and, once concluded, monitor how the strategy contributes or otherwise to putting Europe on a sustainable development path.

Activities:

- Contribute to Europe 2020 review process and to seek revision of the strategy to align it with ecological imperatives;
- Monitor implementation of Europe 2020 and seek for it to be overhauled by the new Commission in the light of environmental and other sustainability considerations and ensure policy coherence.

Sustainable Development Goals and EU Sustainable Development Strategy

In 2015, the EEB will continue to advocate for sustainable development as the overarching objective of Europe’s economic, social and sectoral policies, at the same time seeking coherence between the various policies and the strategies that implement them. The Rio+20 conference in 2012 resulted in a global agreement to start work on a set of Sustainable Development Goals (SDGs). The negotiations were launched in 2014 and are expected to conclude with the adoption of the SDGs in September 2015, when the existing Millennium Development Goals will expire. The EEB will closely follow up the position of the EU at the international negotiating table and feed it with proposals. In addition, as well as seeking to transform the Europe 2020 strategy to serve the interests of sustainable development, the EEB will stimulate and participate in a debate on the future of the EU’s Sustainable Development Strategy, which should as a minimum reflect the content of the future SDGs without being constrained by them.

Activities:

- Continue to monitor and provide input to the SDG preparatory process;
- Develop a paper on SDG governance in Europe and policy coherence;
- Stimulate and contribute to a debate on a genuine EU sustainable development strategy reflecting as a minimum the content of the SDGs.

Circular economy and Sustainable Consumption and Production (SCP)

The concept of the circular economy has entered the political discourse in EU decision-making after the green economy concept. Many elements in the present work programme promote the circular economy, like our zero waste work and resource efficiency work. However, there is a need to define better what it is and ensure that it includes not only the technical approach for reducing our ecological footprint but also social innovation, where significant results can be achieved, and looking at progress using methodologies that go beyond the measurement of GDP.

Activities:

- Develop and promote a meaningful interpretation of the circular economy and promote SCP, in way that it moves away from consumerism and the obsession with economic growth (e.g. through conferences, memoranda etc);
- Fulfil the role of EU Focal Point for NGOs for the 10YFP on SCP and alternate for the Global Focal Point; maintain contact with 10YFP secretariat and international board members; and investigate possibilities for concrete programmes in the framework of 10YFP on SCP in Europe.

Fiscal Reform

In 2015, the EEB will monitor and assess opportunities for work on fiscal reform at EU and Member State level, a new Emissions Trading System, the continuing negotiations on the Energy Tax Directive and the roadmap for the phase out of Environmentally Harmful
Subsidies as well as the European Semester. In response to the euro crisis, the EU developed in 2011 a new mechanism of stronger economic governance. This is organised through a “European Semester” in which national budgets and national reform programmes are subject to scrutiny by both the Commission and the Council. Although the recommendations are not binding, they set a benchmark and can provide strong political signals, for example to phase out harmful subsidies and green the tax base.

Activities:

- Continue cooperation with Green Budget Europe in 2015 to improve the content of Country Specific Recommendations prepared under the Semester and to strengthen their implementation, collaborating with interested EEB members from the country in question as far as possible;

- Promote a progressive revision of the Energy Tax Directive and the roadmap for the phase out of Environmentally Harmful Subsidies if still relevant.

**Better Regulation**

The High Level Group on Administrative Burden Reduction’s mandate ran till October 2014 and adopted a majority set of recommendations that have a clear deregulatory purpose. One of these includes the creation of a permanent independent watchdog body though this was rejected by the European Commission in its latest Communication on REFIT. Irrespective of that, the pressure on EU regulation has become institutionalised through the REFIT programme and a number of environmental policies will be undergoing a fitness check (Natura 2000, Waste, Ecolabel among others). At the same time, the Commission’s internal impact assessment process has been applied in such a way as to reduce the ambition of Commission legislative proposals aimed at protecting the environment rather than mitigating those legislative proposals that threaten it. In the new Commission, Vice President Timmermans has been charged with coming forward with proposals in the first year of his mandate to take the ‘better regulation agenda forward’. The EEB will seek to ensure that none of the High Level Group’s deregulatory recommendations will be supported by the new Commission.

Activities:

- Continue to engage in the ‘better regulation’ debate to prevent it being used as an excuse to press for unwarranted deregulation in the environmental sector, and in particular ensure active engagement in the different fitness checks;

- Seek a strengthened role for environmental sustainability considerations in the Commission’s internal impact assessment process.
CLIMATE AND ENERGY

Climate and energy

Climate change continues to be one of the biggest threats to humankind. In 2015, the EEB will push for its strategic objectives to limit average global temperature increase to 1.5 degree Celsius above pre-industrial levels and achieve a cut in EU emissions of at least 60% by 2030 and at least 95% by 2050. It will also continue to support a push for the necessary measures to achieve this, including an effective Emission Trading Scheme and the mobilising of financial resources to assist the world's most vulnerable countries to adapt and mitigate.

Crucially, the EEB will be active in influencing the shape of the 2030 EU climate and energy policy framework, the backbone of which was agreed by the EU leaders in October 2014. The EEB will continue to promote a new framework based on three coherent and ambitious targets on greenhouse gas emission reductions, energy savings and the share of renewables in the energy mix and challenge the new Commission to think ‘big’ on this. The EEB will give particular attention to the issue of energy efficiency. The EEB will work together with other environmental NGOs to ensure that the ambition level of the targets is sufficient to put the EU on a path to reaching its long-term climate goals, and to call for progressive policies and measures to implement them. The agreement on a 2030 framework, if sufficiently ambitious, will also put the EU in a position to ask its international partners to upgrade their pledges to ensure that a new international climate agreement which will be able to halt climate change is agreed in 2015.

Activities:

- Develop an EEB policy position about the threats and possibilities of the Energy Union initiative.

Energy Efficiency Directive Review and Implementation

A significant reduction in the total amount of energy the EU consumes is critical to achieving Europe’s climate objectives as well as to increasing Europe’s energy security. The main instrument that can currently deliver on this is the Energy Efficiency Directive which was adopted in 2012. In 2015, the EEB will continue to monitor the implementation of the directive in the Member States and at EU level. We will press the Commission to ensure that the review of the Directive undertaken in 2014 will be followed through properly with the 2020 target made binding on the member states and a binding target adopted for 2030 as part of the wider climate and energy package. The EEB will push for the mobilisation of financial resources in support of energy savings, focussing on buildings.

Activities:

- Monitor the implementation of the Directive in the Member States with the help of the EEB working group;
- Work with other NGOs to advocate for a strong 2030 energy savings target.
- Participate in the Coalition for Energy Savings;
- Organise one or two working group meetings.

Ecodesign Directive and Energy Label Regulation implementation and revision

The Ecodesign and Energy Label Framework Directives act respectively as ‘push’ and ‘pull’ instruments to
transform the market towards more energy efficient and more environmentally friendly products. They are implemented through measures specific to each product group listed in the Ecodesign work plan.

In 2015, new legislative proposals to revise the Energy label and certain aspects of the Ecodesign Framework Directives will be released. This is a major opportunity to unleash further the potential of these instruments, notably considering the absolute energy consumption of products beyond their mere efficiency. The implementation of this policy has been assessed as delivering about 40% of our 2020 goal so far, but despite this it is facing resistance that could endanger the ambition of the revision and the pace of its implementation.

In 2015, some existing measures should also be revised, including iconic product groups such as lighting and white goods. In addition, a new Ecodesign work plan for the period 2015-2017 should be finalised. Through its involvement as a permanent member of the Consultation Forum for the implementation of Ecodesign and Energy labelling Directives and the Coolproducts campaign, the EEB will seek to secure as much energy savings as possible through the revision of the Framework Directives, the revision of existing measures and the definition of new measures. A key challenge will be to continue delivering important energy savings while grasping the still untapped potential for resource use optimisation (see product policy). The EEB will also pursue its involvement in two Intelligent Energy Europe (IEE) projects through to 2016. The first, the Market Watch project, deals with market surveillance for energy efficient products and seeks to empower NGOs to contribute to market surveillance. The Efficiency 2.1 project is about developing web and smart phone tools to guide consumers towards best-in-class products and provide tips to save on energy.

Activities:
- Lead the Coolproducts Campaign and intensify positive communication on the policy to counteract a negative perception exacerbated by anti-European media;
- Collaborate with ECOS to secure the release and ambition of new measures and 2015/2017 work plan;
- Undertake the two IEE projects;
- Organise two Coolproducts Working Group meetings.

Biofuels

Under the Renewable Energy Directive (RED), Member States are committed to using 10% of their transport fuels from renewable sources, provided these are sustainable. The policy in its current form however fails to adequately account for the full emissions caused by biofuels used for meeting this target. After a long delay in proposing a methodology to factor in emissions from Indirect Land Use Changes (ILUC), the Commission published a legislative proposal aiming at solving the ILUC problem. In 2015, the EEB will continue its efforts to ensure the adoption of a revised RED that contains a relevant limit on first generation biofuels and ILUC. After the adoption of the revision, we will ensure at national level that Member States effectively apply the new regulation and that they also stop subsidizing first generation biofuels above current consumption levels. We will help members monitor the implementation of this revision.

Activities:
- Advocacy work to ensure that the texts are improved in second reading to get closer to the Parliament’s initial position;
- One large meeting with national NGOs working on biofuels;
- 1 or 2 working group meetings jointly with the agriculture working group;
- Bioenergy newsletters to be sent to members every two weeks on biofuels/biomass.
**Energy Infrastructure**

The delivery of essential energy infrastructure, necessary for a transition to a sustainable renewable energy system in Europe, can at the same time present certain risks for nature and environment. The development of such projects can however be done in a way which minimises such risks, if the EU’s environmental obligations and objectives as well as its climate goals are fully respected. The EEB will strive to ensure that in the course of defining the Energy Union vision, the process of energy infrastructure planning and development in the EU, including the identification of energy infrastructure Projects of Common Interest (PCI) (projects of greatest priority for the EU to achieve its energy and climate policy objectives) is done in a transparent way, ensuring public participation and dialogue among different stakeholders. This should also fully respect EU biodiversity and climate goals. This will lead to smaller impacts on nature, better public acceptance, and swift delivery of cleaner energy.

Activities:

- Advocacy work to ensure a more transparent and participatory process of developing and planning of essential energy infrastructure in Europe, including the selection of PCIs, with a view to ensuring that only environmentally acceptable projects which are also in line with EU climate objectives are delivered;
- Actively follow the development of EU-wide ten-year network development plans (TYNDPs) and PCI selection, and ensure that the next gas TYNDP does not inflate Europe’s gas needs and acknowledges climate commitments.

**Biomass**

While there is increasing insecurity around the policy framework for renewable energies after 2020, bioenergy is still expected to play a major role in the energy mix of Member States. Time is running out on proposing effective safeguards for bioenergy use that could be implemented before 2020 but the year 2015 will be crucial in shaping the elements of the EU’s climate and energy framework until 2030. In its Communication on the framework published in early 2014, the Commission does already recognize that ‘improved biomass policies’ are needed in the EU. The EEB will push the Commission to take up the task of developing these policies. The EEB will also work to ensure that policies developed by the Commission address the key sustainability concerns related to bioenergy, particularly delivery of true GHG savings, resource-efficient use of biomass that recognizes the sustainable limits of supply and using biomass resources that do not significantly increase the pressure on arable land and forests.

Activities:

- Advocacy work around the European Commission and Member States to develop a meaningful policy proposal for safeguards on bioenergy use;
- Commission and publish an original study about the sustainable limits of bioenergy use in Europe and resource-efficient ways to use that potential;
- Reinforced cooperation with the national level, particularly in countries developing their own national policies for biomass sustainability.

**Unconventional fossil fuels**

Unconventional fossil fuels come with both serious environmental and political risks: environmental e.g. due to the use of chemicals, and political as it has been a major distraction to the prospect of developing a high efficiency, high renewables climate and energy agenda. Expectations that the Commission would come forward with a new dedicated legal instrument to ensure the environmental safety of shale gas as part of the 2030 package in early 2014 were unfortunately not realised. However, the Commission did issue a Recommendation on the topic which will be reviewed in July 2015 and could eventually pave the way to a binding instrument.
Activities:

➢ For 2015, address shale gas and other unconventional fossil fuels exploration in relevant EU policy, as well as, subject to availability of funding, keep a watching brief on the implementation of the Recommendation and provide input to the review process;

➢ Work with the Fuel Quality Directive in order to exclude the import of unconventional fossil fuels.

Nuclear

The EEB has always rejected nuclear power as part of the solution to climate change. Several years after the Fukushima disaster, the Japanese government has been unable to stop the daily leakage of large quantities of radioactivity into the environment and there is no clear idea of when the situation will be brought under control. While it is to be hoped that the lead-up to UNFCCC COP-21 in 2015 will increase pressure to reduce greenhouse gas emissions, it is important that this does not open the door to nuclear expansion.

Activities:

➢ Continue to keep a watching brief on nuclear issues, including state aid and transboundary consultation issues, and intervene selectively in the debate, with particular emphasis on transparency and participation issues (the Aarhus/nuclear interface);

➢ Collaboration with Nuclear Transparency Watch (NTW) should continue in order to strengthen the European NGO work on nuclear issues.
NATURE AND BIODIVERSITY

Biodiversity Strategy

The EU 2020 Biodiversity Strategy was adopted in 2011 with a view to halting the loss of biodiversity and preventing collapse of ecosystems that provide an array of services that are essential for our well-being. The progress towards achieving the targets set out in the Strategy is going to be assessed in 2015 in the context of a mid-term review of the Strategy. The EEB will focus on ensuring that the ambition of the targets is maintained or increased, with additional measures being taken where needed to reach the Biodiversity Strategy and global Aichi targets.

Activities:

- Follow the implementation of different targets of the EU 2020 Biodiversity Strategy, in cooperation with our partners in the European Habitats Forum;
- Advocate for an ambitious implementation of current Strategy actions and adoption of additional measures where necessary for achieving the EU and global biodiversity targets;
- Convene two meetings of the EEB’s biodiversity working group.

Natura 2000 evaluation

The Birds and Habitats Directives, with the Natura 2000 network, remain the cornerstone of Europe’s efforts to safeguard its biodiversity. The effective management and conservation of the network is of the highest priority for the EU to reach not only its biodiversity but also its climate and energy targets. In 2015, the Commission will prepare the next evaluation round of the Habitats Directive which, if Member States deliver the appropriate data, will for the first time deliver a trend analysis for Europe’s most important protected species and habitats. The political agenda of the new Commission has significantly increased the risk of nature protection laws being weakened, with the Environment Commissioner being asked within the context of the REFIT programme to carry out an in-depth evaluation of the directives and ‘assess the potential for merging them into a more modern piece of legislation’.

Activities:

- Implement a campaign for defending nature and EU nature protection policy in Europe;
- Actively follow the evaluation of the Birds and Habitats Directives and safeguard the ambition of the EU biodiversity regulatory framework.

No net loss initiative

As part of the EU Biodiversity Strategy, the EU is exploring ways to ensure that there is ‘no net loss’ of ecosystems and their services for areas and species not covered by existing EU nature legislation. This can become a mechanism which locks in biodiversity loss by planning for biodiversity to be sacrificed in one place to restore a supposedly equivalent amount of biodiversity in another place. The EEB will engage in this debate with the aim to ensure that any new initiatives ensure that further harm to biodiversity is avoided and already degraded ecosystems are restored.

Activities:

- Advocate to ensure that the ‘No net loss initiative’ avoids further degradation and loss of biodiversity and achieves restoration of degraded ecosystems, building on improved integration of biodiversity in policies primarily responsible for biodiversity loss and improved implementation and stringent enforcement of existing EU environment legislation.
Invasive Alien Species

Invasive alien species (IAS) are one of the main drivers of biodiversity loss both in Europe and globally and can cause significant damage also to human health and the economy. In the EU alone, the costs are estimated to be at least €12 billion annually. The adoption of an IAS Regulation in 2014 therefore represents a vital step in addressing this problem in the EU, which is expected to be further exacerbated by climate change, habitat destruction and increased global trade and travel. However, if the Regulation, which will enter into force in January 2015, is to effectively deliver on its objective of preventing, minimising and mitigating the adverse impacts of invasive alien species on biodiversity, ambitious implementation at both EU and Member State level will be needed. The EEB will follow closely the implementation process, including the development of the list of the IAS of EU concern and keeping a close eye on the authorisation of certain commercial activities involving species considered of being of EU concern.

Activities:

- Support the IAS Regulation implementation process at the EU level, including by ensuring the adoption of an ambitious list of IAS of EU concern, and providing support for advocacy work for national level implementation in different Member States.

Sustainable agriculture

In 2014, the dust of the Common Agricultural Policy (CAP) reform finally settled with the adoption of a set of delegated and implementing acts to implement this new policy. The result is that next to nothing from the original ambition of the green reform remained, 2015 will be the first year of the implementation of this new policy. Following the work it did over the year 2014 in closely monitoring Member States’ preliminary choices, the EEB will monitor and evaluate the implementation of this policy through studies and by engaging in the development of rural development programmes. Alongside the work on the implementation, it will look at other policy tools that can contribute to more sustainable farming in Europe, such as the revision of the NEC Directive and the sustainable food communication. 2015 will also be a year for thinking towards the future agriculture policy (post 2020) and the strategy around it, including the identification of new allies, in order to shape the debate at an early stage.

Activities:

- Monitor and analyse the implementation of the new CAP;
- Monitor the implementation of the European Innovation Partnership on Agricultural Sustainability and Productivity in Rural Development;
- Engage in the broader debate on what constitutes sustainable agriculture and how to tackle unsustainable production and consumption of food, including the problem of food waste, and ensure that the Communication on sustainable food is followed by concrete actions;
- Explore synergies with the Industrial Emissions Directive process and NEC Directive revision process in order to
ensure that agricultural emissions are addressed as far as possible;

- Support and promote organic farming and provide input to the revision of the regulation;
- Organise two meetings of the EEB’s Agriculture working group, one linked with a conference;
- Engaging with key stakeholders.

**Genetically Modified Organisms (GMOs)**

The debate on GMOs at an EU level started again in 2014. It is likely that in 2015 a deal will be reached between the Parliament and the Council in second reading on the proposal to allow Member States to introduce/maintain national bans on GMOs. In 2015, the EEB will monitor this co decision process and continue to push for a comprehensive EU system of authorisation which prevents environmental damage and the contamination of conventional and organic farming.
REACH Implementation

The continuous development of safer chemicals and acceleration of the pace at which safer alternatives are introduced into the market are needed in order to achieve a sustainable chemical industry and a toxic-free environment. Unfortunately, seven years after the entry into force of the REACH Regulation (Registration, Evaluation, Authorisation and Restriction of Chemical Substances), progress in implementation is slow, especially for restricting hazardous chemicals in the market. Only a few restrictions have been included in REACH annex XVII and the authorisation list of most problematic substances (REACH annex XIV) is still not comprehensive enough. Moreover, the quality of the information provided by industry is a challenge (69% of the registration dossiers are not in compliance) and does not allow European citizens to know the risks associated with the chemical substances they are exposed to, nor to make informed decisions on safe handling. In 2015, the EEB will continue to be closely involved in REACH implementation and will advocate for the phase-out and restriction of the most problematic substances in Europe, as well as step up its efforts to use the legal opportunities to close significant gaps under REACH in relation to endocrine-disrupting chemicals (EDCs), the poor quality of the registration dossiers and the dissemination of information to citizens. The focus will be to achieve the substitution of chemicals of concern by 2020, to tackle cocktail effects and nano materials, and to address transparency issues as well as delivering on information generation on chemicals through REACH to be used for other EU policy frameworks (e.g. Ecolabel, Ecodesign etc).

Activities:
- Represent environmental interests in the European Chemicals Agency (ECHA) Committees and its Management Board as well as the Competent Authorities’ CARACAL meetings;
- Participate actively in REACH implementation, focussing on achieving the substitution of hazardous chemicals, prioritising substances of very high concern (SVHCs) by 2020, ensuring that authorisations are not granted for SVHCs for which feasible alternatives are available in the market, better quality of registration dossiers, dissemination to the public of information on chemical substances to which they are exposed, and tackling cocktail effects and nano materials;
- Organise one or two meetings of the EEB Chemicals working group.

EU regulation of nano materials

Despite having been asked by the Parliament to do so, the Commission continues delaying action to start regulating the use of nanomaterials. The only initiative undertaken has been an Impact Assessment study to decide whether an EU-wide register of nanomaterials is needed and whether to amend the REACH annexes and guidance.

In its current form however, REACH has no provisions and instruments that effectively cover nanomaterials. In 2015, the EEB will continue with the intensification of its work on nano started in 2012 and campaign for the development of a new nano-regulation, as well as engage in other relevant processes such as the REACH review.

Activities:
- Follow and seek to influence the preparations for the Commission’s proposals for amending REACH annexes;
- Ensure that the Commission will develop a nano register at European level, useful for both competent authorities and European citizens;
- Insist that the Commission takes additional action to regulate nanotechnology outside the context of REACH;
- Integrate nanotechnology into the agenda of the EEB chemicals working group meetings.
**Air – Ambient Air Quality**

Poor ambient air quality is a major environmental health problem in Europe. In urban areas, over 90% of the population is exposed to levels which are considered dangerous for their health. Many Member States face infringement action because they still fail to comply with existing EU ambient air quality standards. Whereas the quick implementation of current legislation is an absolute priority, the EU should also look into revising its standards to align them with the guidelines set by the World Health Organisation (WHO).

**Activities:**
- Highlight examples of best practices aiming at improving urban air quality, in cooperation with EEB national members;
- Monitor ECJ and domestic court cases related to the breaches of ambient air quality limit values in cooperation with EEB members and legal experts;
- Ensure that the new NEC and MCP Directives bring EU Member States closer to reaching WHO air quality guidelines by 2030;
- Organise one or two meetings of the EEB’s air working group.

**Air – NEC revision**

On 18 December 2013, the European Commission adopted a package of proposals to improve air quality in Europe. The centrepiece of the package is a proposal to revise the National Emission Ceilings Directive (NEC). The NEC Directive is the cornerstone of EU air legislation and its revision will set new emission reduction commitments for major air pollutants for 2020, 2025 and 2030. If ambitious enough, the outcome of this process will lead to significant benefits for Europeans’ health and environment.

**Activities:**
- Seeking to dissuade the Commission from applying the ‘political discontinuity principle’ to withdraw the legislative proposal or to threaten such withdrawal in order prevent the proposal being strengthened in the co-decision process;
- Generate and share information about air pollution from medium scale combustion plants and its impacts on health and the environment;
- Ensure that the European Parliament and Member States adopt an ambitious Directive;
- Inform EEB members about the ongoing decision-making process and ensure their effective representation in Brussels;
- Organise one or two meetings of the EEB’s air working group.

**Air - Medium Scale Combustion plants**

As part of its air quality package adopted on 18 December 2013, the European Commission published a proposal to limit air pollution from installations between 1 and 50 megawatts (MW). With this proposal, the Commission is finally addressing a sector which until now was out of the scope of the EU’s air policy despite its significant contribution to air pollution.

**Activities:**
- Seeking to dissuade the Commission from applying the ‘political discontinuity principle’ to withdraw the legislative proposal or to threaten such withdrawal in order prevent the proposal being strengthened in the co-decision process;
Environmental Noise Directive

The Environmental Noise Directive (END) defines a number of procedures for Member States according to which they should reduce noise pollution levels. Since the end of a public consultation in 2012, the European Commission has been expected to come up with a proposal for revision of the Directive.

Activities:
- Monitor, if appropriate, developments on EU noise policies (END and source policy) in particular if the European Commission comes up with a proposal to revise the END.

EU Mercury Strategy revision

At the EU level, in 2015, the EEB will continue pushing for rapid EU ratification of the Minamata Convention on mercury, as well as the implementation of remaining actions under the 2005/2010 strategy and for the adoption of new measures, which in turn will facilitate implementation of the new mercury treaty.

Activities:
- Carry out advocacy work in support of EU level measures to phase out mercury from different sectors, including:
  - the revision of the regulation on mercury export ban and storage,
  - measures towards a mercury phase-out in dentistry,
  - the development of Best Available Techniques reference documents under the Industrial Emissions Directive where relevant, and
  - the inclusion of mercury under the National Emissions’ Ceiling directive;
- Follow up relevant EU work in preparation of the EU’s ratification of the Mercury treaty.

Mercury ‘Minamata’ Treaty Implementation

The Minamata Convention on Mercury was adopted by world governments in October 2013, in Kumamoto, Japan, under the auspices of the United Nations Environment Programme (UNEP). The treaty has been signed by 97 countries and ratified by one (USA). In 2015, the EEB will continue to lead the Zero Mercury Working Group (ZMWG) and the Zero Mercury campaign, pushing for early entry into force of the treaty. It will seek to ensure an effective representation of NGOs in the relevant meetings, during the interim period, until the treaty enters into force after 50 countries have ratified it. Furthermore, during the interim period, the EEB via ZMWG will seek to assist NGOs, mainly in developing countries, to prepare for ratification and implementation of the treaty.

Activities:
- Coordinate and lead NGO input into the intergovernmental processes during the interim period, including organisation of NGO preparatory meetings;
- Coordinate and support NGOs attending the intergovernmental negotiation committee meetings, as well as NGO experts attending UNEP expert groups;
- Support international projects, mainly in developing countries, in preparation for the ratification and implementation of the treaty as well as on mercury reduction activities.

Industrial Emissions Directive

Following the adoption of the Industrial Emissions Directive (IED) in 2010, which regulates major industrial activities, attention moved to implementation. The Sevilla Process, which sets ambitious standards for environmental performance benchmarks –so called Best Available Techniques (BAT) Reference Documents (BREFs), has gained in political importance since BAT
conclusions are now legally binding and the legal status of BREFs have been strengthened according to the IED. The EEB will actively coordinate the NGO involvement in this process to ensure that environmental ambitions are upheld. The EEB will also continue to push for strict enforcement and to challenge derogations from state of the art compliance.

The IED will be up for review as regards the potential extension of the minimum binding requirements for certain pollutants or activities – so called European Safety Net, for which the Commission shall provide a proposal at the latest by 7 January 2016 together with an implementation report.

Implementation of the newly adopted Seveso III Directive will be followed by EEB members.

Activities:

- Organise technical expert input, coordinate and provide active NGO involvement in the Sevilla process;
- Set up and manage a dedicated NGO Sevilla platform (dedicated website);
- Support members in enforcement work;
- Be involved in the upcoming legislative review of IED;
- Organise one or two meetings of the EEB’s industry working group.
WATER

Water Framework Directive

The Water Framework Directive (WFD) continues to be the EU’s central piece of legislation aiming to ensure a comprehensive protection of Europe’s waters. Although some improvements have been made since the adoption of the WFD, the EEA State of Water report and the Commission’s assessment of the first River Basin Management Plans (RBMPs) showed in 2012 that more than half of Europe’s surface water bodies are in less than good ecological status and that by 2015, measures by Member States are expected to increase this only to slightly over half of surface waters. The second RBMPs, which Member States are required to adopt towards the end of 2015, will have to be much more ambitious if the main pressures, especially the modifications of water bodies and unsustainable agricultural practices, are to be adequately tackled, and significant improvements in status achieved by the end of the second managing cycle. The EEB will aim to bring the required ambition into the second RBMPs through actively engaging in the WFD implementation processes at the EU level, initiated as a follow up to a Blueprint to Safeguard Europe’s Water Resources, and by supporting members in their advocacy work at national level.

Activities:

► Advocate for an ambitious 2nd cycle of RBMPs, including through active participation in activities of the WFD Common Implementation Strategy process;
► Actively follow the official implementation process of the WFD, as well as NGO initiatives where appropriate;
► Push for hydromorphological pressures, including those from navigation and hydropower developments, and diffuse pollution from agriculture, to be adequately addressed;
► Support members in their complaints about poor implementation and in their work influencing the development of the 2nd RBMPs;
► Organise two meetings of the EEB’s water working group.

Priority Substances Directive

Chemical water quality aspects are primarily regulated by the Directive on priority substances which sets maximum allowed concentrations of harmful chemicals in surface water. The list of substances is regularly reviewed with new substances added or concentrations changed. The latest process of identification of substances to be regulated under the Priority Substances Directive started in 2014. The EEB will push for a significantly increased list of regulated substances with stricter standards. At the same time it will aim to ensure that pharmaceuticals which are damaging for the aquatic environment are properly regulated at the EU level and that chemical combination effects are considered when regulating substances.

Activities:

► Work on chemical aspects of ensuring good water status as a follow up to the 2013 revision of the Priority Substances Directive, including by actively engaging in the process of development of a revised list of priority substances and ensuring that environmental risks from pharmaceuticals are adequately tackled.

New instrument on water reuse

Lack of standards for re-used water was identified in the Blueprint to Safeguard Europe’s Water Resources as one of the gaps that would potentially require the current framework to be complemented by an action of a legislative nature. The Commission is - in cooperation with Member States and stakeholders -
exploring possible options for an EU-level instrument to encourage water re-use, including a regulation establishing common standards. The proposal is scheduled to be presented at the end of 2015. In case the Commission tables a legislative proposal on water re-use, the EEB plans to actively follow the negotiations.

Activities:

- Push for a legislative instrument on water re-use and carry out advocacy work in case a legislative proposal on water re-use is tabled.

**Marine Protection**

With over 80% of assessed fish stocks in the EU deemed as overfished, the newly adopted CFP which will be in force for another 10 years will now need to safeguard Europe’s fish stocks and secure a sustainable future for Europe’s fisheries. In addition, a number of legal instruments will continue to play an important role in protecting the marine environment, in particular the implementation of the Marine Strategy Framework Directive and the newly proposed Maritime Spatial Planning Directive. At the same time, Blue Growth is gaining attention and momentum through the Commission’s Blue Growth Strategy which is expected to add to existing pressures on marine resources.

Activities:

- The EEB will continue in 2015 to cooperate with Seas at Risk and the wider NGO coalition it is part of, providing political support where relevant.
RESOURCES, WASTE AND PRODUCTS

Resource Efficiency Roadmap

The Resource Efficiency Roadmap was an important element of the EU 2020 Strategy and one of the main instruments to integrate environmental sustainability into different EU policies. In 2015, the new Commission will have fully settled in and the revision of the EU 2020 Strategy will be in full swing. As part of the EEB’s effort to use this revision to turn the EU 2020 into a real sustainable development strategy, we will seek to ensure that resource efficiency remains high on the political agenda of the next Commission. We will further work on ways to achieve a reduction of resource use in absolute amounts, to tackle the rebound effect.

Activities:

- Follow up the development of resource efficiency related initiatives including targets and indicators to assess and influence the success of the Roadmap;
- Participate in the European Resource Efficiency Platform in the case that its mandate is extended;
- Participate in the Resource Cap Coalition.

Waste Framework Directive revision

As part of the Waste target review, a Commission proposal was released in 2014. In 2015, the co-decision process between the Parliament and the Council on this dossier is expected to intensify. The EEB will use this opportunity to push for stronger recycling targets and the introduction of waste prevention targets and measures, drawing from the experience of its members in implementing the existing Waste Framework Directive. This will also be a major opportunity to link waste and product policy more, as part of an integrated project on delivering a resource-efficient Europe.

Activities:

- Seeking to dissuade the Commission from applying the ‘political discontinuity principle’ to withdraw the legislative proposal or to threaten such withdrawal in order prevent the proposal being strengthened in the co-decision process;
- Advocacy work during the revision of the Waste Framework Directive, notably requiring more ambitious waste prevention and recycling targets and more harmonized and widely spread economic instruments for waste minimisation;
- Develop advocacy material and support EEB members in contributing to and enforcing adequate implementation of the Waste Framework Directive;
- Push for more stringent recycling targets with regard to municipal solid waste and industrial and commercial waste, and for new ones for biowaste and textiles;
- Organise two EEB working group meetings;
- Cooperate with Zero Waste Europe.

Revision of the Packaging and Packaging Waste Directives (P&PWD)

The P&PWD will be going through the co-decision process in 2015. This policy addresses the whole life cycle of the packaging, and thus enables it to be optimised from the design stage. Packaging streams are iconic of the linear throw-away society and their re-orientation towards circular economy models represents a major challenge as well as a major opportunity.

As the design stage of packaging is determined by the formulation of the essential requirements for packaging, the EEB will strive for the revision of these provisions, which have not been updated since 1994. Defending reuse targets and securing increased recycling ambition, notably for plastic and wood packaging, will also be a key task. The review also provides an opportunity to boost paper, metal and glass recycling targets, and seek prevention and reuse targets.
Activities:

- Seeking to dissuade the Commission from applying the ‘political discontinuity principle’ to withdraw the legislative proposal or to threaten such withdrawal in order prevent the proposal being strengthened in the co-decision process;
- Orient the P&PW Directive towards circular economy models, notably through the review of the obsolete formulation of the essential requirements;
- Secure the high obligatory quantified reduction target to reduce the consumption of plastic bags in the proposal for P&PWD;
- Set prevention and reuse targets distinct from recycling targets;
- Boost recycling targets with associated separate collection; notably for plastics and wood packaging;
- Set a coherent recycling definition for all the Directives concerned, including quality criteria and leading to certification of reuse and recycling facilities.

Revision of the Landfill Directive

The Landfill Directive, which dates from 1999 and mainly sets some diversion targets for biodegradable waste, belongs to the package of waste directives which were part of the 2014 waste target review. In 2015, the co-decision process on the Commission proposal that came out of that review will be in full swing. The EEB will push for the existing diversion targets to be transformed into a ban on direct landfilling of recyclable and compostable waste. The key objective is to divert waste from landfill while preventing that the diversion contributes primarily to increased incineration and energy recovery rather than to material recovery.

Activities:

- Seeking to dissuade the Commission from applying the ‘political discontinuity principle’ to withdraw the legislative proposal or to threaten such withdrawal in order prevent the proposal being strengthened in the co-decision process;
- Advocate for a ban on landfilling of untreated waste, a phase out of recyclables and compostables going to landfill or incineration, and increased use of taxes on landfilling and incineration;
- Promoting the use of economic instruments to help to address the implementation gap;
- Run a joint campaign with Zero Waste on waste reduction and zero residual waste to landfill or incineration.

Building the single market for green products

The SCP Action Plan review finally resulted in a communication on ‘building the single market for green products’ in 2013. As a follow up, the pilot phase for the product environmental footprint methodology - PEF (as well as an organisation environmental footprint - OEF) was designed and set up by DG Environment. In 2014, a first wave of 14 different product groups started drafting, testing and refining the footprinting methodologies. The EEB will carefully monitor this exercise to make sure that the screening of environmental impacts over the whole life cycle is comprehensive and no major hotspots are missed when product category rules are drafted and communication tools for the ecological profile set up. Before any existing product policy or environmental labelling scheme can take into account the information generated by the PEF methodology, a thorough analysis of its validity and flaws has to take place. Therefore the EEB is also pushing for clearer policy objectives to guide further development and future application of the PEF methodology, so that it can finally mitigate the proliferation of green claims. This is particularly important for the second wave of pilots on food products, getting started in 2015.

Activities:

- Monitor the drafting, testing and refining of PEF/OEF methods – even if
individual product category rules cannot be assessed; and carefully explore and evaluate its validity especially when new communication tools are designed;

- Discuss and assess PEF/OEF methods as well as their possible future applications in the EEB’s waste and product working groups;
- Help to revive the SCP group to provide political guidance on the PEF/OEF development and to strengthen coherence between different instruments for EU product policy (Ecolabel, GPP, Ecodesign, Energy labelling).

Resource-related aspects in EU Product and Ecodesign Policy

With the proposals for revisions of different legal instruments in the area of EU product and waste policy on the negotiation table for 2015 (Waste Framework Directive, Packaging and Packaging Waste Directive as well as Ecodesign and Energy labelling Directive), this provides a unique opportunity to ensure these live up in a coherent way to the political commitment made by the EU institutions to resource efficiency and a greener economy. To achieve support for ambitious legislative proposals, the EEB has already built coalitions amongst EU NGOs and engaged in early discussion with the European Commission, the consultancy companies working on the reviews and EU industry federations in order to smooth the integration of ambitious proposals into legal texts. In 2015, the EEB will also build on its extensive network of national members, the Coolproducts campaign and the Zero Waste Europe Platform to mobilize public support, prepare advocacy work and emphasize the environmental and economic benefits expected from resources use optimization in particular regarding future Ecodesign Policies at EU level.

Activities:
- Leverage arguments as to why it is necessary, possible and feasible to address resource use in Ecodesign policies, building on an EEB study to be released at the end of 2014;
- Influence the preparation and development of revised Ecodesign legislation;
- Convene a high level demonstration event in the European Parliament on durability and reparability of products;
- Facilitate discussions with key stakeholders on possible requirements for resource use in products;
- Investigate & promote industrial innovation and new business models for resources efficiency benefiting from Ecodesign regulations;
- Organise working group meetings and/or NGO training events on Ecodesign policies regarding resource use;
- Carry out outreach and support activities through the EEB network and Coolproducts campaign as well as through social media and viral action.

Push for the development of normalised measurement and rating methods to assess and improve resource use in products.

Ecolabel

The EEB has for the last 20 years provided expert input on behalf of environmental NGOs into the development of technical criteria for the EU Ecolabel, working in cooperation with the consumer organisation BEUC, and we will continue to do so in 2015.

Activities:
- Coordinate expert input into Ecolabel criteria development.

Green Public Procurement (GPP)

Currently DG Environment develops criteria for different product groups which Member States can use, on a voluntary basis, when developing their GPP policies.

Activities:
- Coordinate expert input into GPP criteria development.
HORIZONTAL LEGAL INSTRUMENTS

Concerning all issues under this heading:

Activities:
- Coordinate via the EEB law group NGO input into the debates and votes;
- Organise one or two meetings of the EEB law group;
- All the EEB’s sectoral working groups will also deal with enforcement issues.

Better Enforcement – new tools and complaint handling

In its March 2012 Communication on how to improve enforcement of EU environmental law through better knowledge and responsiveness, the Commission put forward some general proposals for new tools including a concept for a “Structured Implementation and Information Framework” (SIIF) and better monitoring in general. The EEB will advocate for the development of the SIIF, more transparency and better information sharing being an important tool for improving enforcement. The EEB Law Group started in 2014 to discuss better information exchange on complaints and the possibility of a more strategic approach to the submission and follow-up of complaints. This will be continued in 2015.

Activities:
- Follow up with regard to initiatives for better reporting, more transparency and sharing of best practice;
- Strengthen cooperation and information exchange on complaints.

Environmental Inspections

The EEB has for many years asked for a new legal instrument to improve and harmonise the quality of environmental inspections and so enforcement of the environment laws, and was therefore pleased to see a positive reference included in the 7EAP. To include provisions for environmental inspections in sectoral law can improve the situation in some areas but will not lead to a harmonised approach which is important to protect the environment but also to provide a level playing field for industry. All EU institutions underline the importance of better implementation so that the EU’s impressive body of environmental law will finally deliver as intended. An Environmental Inspections Directive could make a major contribution. Unfortunately the outgoing Commission failed to issue a legislative proposal, despite the fact that considerable preparatory work was undertaken by DG Environment.

Activities:
- Continue to press the Commission to issue a legislative proposal on environmental inspections, if this has not been done by the end of 2014;
- Once a proposal is issued, follow it through the co-decision process to its adoption with a view to ensuring that it will not hamper or weaken inspection provisions already existing in sectoral law;
- Discuss the draft with Commission officials in a special session of the EEB Law Group.

Environmental Impact Assessment

Since its adoption in 1985, the Environmental Impact Assessment (EIA) Directive has been one of the major European instruments for environment and health protection. The EEB was pleased that the revised EIA Directive entered into force in May 2014 even though the adopted text fell well short of what NGOs had originally hoped for. The revised directive includes many improvements helping to overcome some of the shortcomings and loopholes in the previous directive and improving public participation to some extent. Now it is important to inform NGOs of the new requirements and their improved rights for information and participation and encourage them to monitor the transposition in their country.
Activities:
- Continue collecting information on complaints cases about bad transposition of the EIA Directive or about breaches in its application;
- Whenever possible, provide support to EEB members having submitted such cases;
- Prepare guidance on the changes in the revised EIA Directive and encourage members to follow the transposition into national law;
- Ask for training sessions and guidance documents for those who have to apply the new directive.

Environmental Liability Directive review (ELD)

The number of ELD-related complaints cases is still very limited. The ELD revision will enter into the final phase in 2015. The EEB will advocate for a strengthening of the Directive. It will also continue following the discussions on financial security schemes.

Activities:
- Follow the revision process as closely as possible; prepare proposals for eg extension of the scope of the ELD, clearer formulations and requirements replacing some of the recommendations to reduce the scope for different interpretations during the transposition, ensure that the directive is in line with Aarhus requirements – public participation provisions need to be improved, aiming at a more harmonised legislation among the Member States;
- Organise a workshop with other stakeholders in spring, eg insurance companies, to discuss common objectives.

Environmental Crime Directive (ECD)

The Environmental Crime Directive requires EU Member States to provide for criminal sanctions for the most serious environmental offences. It was adopted in 2008 and was due to be transposed by the end of 2010, though many Member States failed to meet this deadline.

Activities:
- Collect information on cases on the application of the Environmental Crime Directive, in cooperation with other organizations such as BirdLife which started a project on breaches of the ECD with regard to bird hunting.

ALLIANCE BUILDING

Green 10, Spring Alliance, Beyond 2015

In 2015, the EEB will continue to be part of strategic political alliances such as the Green 10 and the Spring Alliance, in particular for work on horizontal issues and to influence cross-cutting processes. It will also build on its collaboration with development organizations through participation in the European Task Force of the Beyond 2015 campaign.
GLOBAL POLICIES AND SUSTAINABILITY

The notion of a sustainable Europe, even if it can eventually be achieved, does not make sense within an unsustainable world. The success of efforts to develop stronger EU policies on the environment cannot be viewed in isolation from developments elsewhere in the world. European lifestyles are still built on the account of the people and resources of the Global South. Material and financial flows are going from South to North, which implies an active process of impoverishment and enrichment. Resource extraction, with all environmental and social damage is one example, land-grabbing is another. European solutions must be founded on the principle of global social and environmental justice.

Global environment and sustainable development agenda

Europe has historically been and currently remains responsible for a disproportionately high share of global environmental destruction and resource consumption, thus tackling its own excessive ecological footprint is paramount. However, in addition, the EU needs to play a leadership role in the global and inter-regional debates on environment and sustainability, even if its influence on the world stage is less than in former times. That role can be a constructive one, exchanging best practices with developed countries in achieving the transition to sustainable equitable economic models that go beyond GDP as a measure of progress and sharing some of its good practices e.g. in the field of governance; or a less constructive one. It should explore new and innovative ways of funding the transition in developing and BRICS countries, transfer of technology and capacity building.

The international process of defining sustainable development goals has provided an opportunity to ensure that environmental considerations feature more prominently in discussions on the development paradigm, whether it be in developing, emerging or developed economies. The outcomes will be duly followed and governance and tools for implementation promoted.

Building upon its successful engagement in the Rio+20 (SDG) process and considering that this process is merged with the Post-2015 process (follow-up to MDGs), the EEB will seek to be engaged actively as Organising Partner for the Major Group of NGOs. It will be a challenge to bring together both environmental and development-oriented civil society movements and build upon a new development paradigm shift, where wellbeing and recognition of planetary boundaries are key, rather than economic growth. In 2015, the EEB will be actively engaged in the global and inter-regional discussions on this process with a view to monitoring and influencing the role of the EU in those discussions, providing direct input to them and/or facilitating civil society input, and engaging in a dialogue with civil society organisations from around the world.

Activities:

→ Participate in and provide input to the Rio+20/Post-2015 follow-up process;
→ In particular, engage in the mobilisation around and implementation of sustainable development goals (SDG) and be part of the European Steering Group of the Beyond 2015 campaign in order to better link the environmental and development movements;
→ Monitoring and influencing EU involvement in and providing direct input to UNEP and the associated processes; integrate EEB’s EU policy work in those processes;
→ Update the Atlas of Environmental Justice, a worldwide mapping of ecological conflicts; within the framework of the Environmental Justice Organizations, Liabilities and Trade (EJOLT) project;
→ Participate in a new 3-year European Year for Development project (EYD2015) on Fair Supermarket Brands;
→ Reach out to other sectors in society in order to encourage them to involve the environment in their SDG work.
Pan-European outreach

In 2015, the EEB will continue to support the European ECO Forum in maintaining NGO involvement in the Environment for Europe process and other UNECE processes, engaging as appropriate in the Coordination Board of the European ECO Forum and by providing input to the preparations for the next Environment for Europe Ministerial conference foreseen for 2016. The EEB will also continue to participate in the Friends of Shared Environmental Information Systems (SEIS) work and facilitate NGO input there.

Enlargement, European Neighbourhood Policy (ENP) and Eastern Partnership

The EEB will continue its activities aimed at promoting better environmental policies in the countries neighbouring the EU and strengthening collaboration with NGOs working in those regions. We will continue to monitor developments regarding accession negotiations with candidate countries in South-East Europe and Turkey through our work within the project called ENV.net. We are hopeful that the specific project focused on working with civil society organisations in Kosovo to promote a sustainable development strategy for the territory, including by facilitating links to the EU institutions, will continue. We will also work with our members and other interested NGOs in the countries within the ENP and Eastern Partnership.

Organisation for Economic Cooperation and Development (OECD) liaison

The OECD plays an important role in shaping environmental policy in developed countries, providing a forum for influential debates on topical issues. For a number of years, the EEB has facilitated input to OECD environment-related processes from NGOs from throughout the OECD region.

In 2015, the EEB will continue to coordinate the NGO input into the implementation of the OECD’s environmental work programme, making additional efforts to secure good geographical balance to all OECD countries. We will also be involved in some country reviews, to mobilise environmental NGOs to be consulted.

Mediterranean

Through its involvement in the Mediterranean Information Office for Environment, Culture and Sustainable Development (MIO-ECSDE), the EEB will monitor and selectively engage in Mediterranean activities.

EU-US Trade negotiations

In 2013, negotiations for a new bilateral trade deal between the US and the EU kicked off. In 2014 it quickly became one of the most controversial political projects of the EU and the original objective of reaching agreement by the end of 2014 has been pushed back to 2015 and even 2016. The EEB has increased its engagement, focusing in particular on regulatory cooperation, and proposals for an investor state dispute settlement mechanism.

Activities:

- The EEB will closely monitor these negotiations and address these as part of its ongoing work on topics such as REACH as well as on a more horizontal level.
ENVIRONMENTAL DEMOCRACY

Aarhus Directives and Regulation – information, participation and justice in the EU

Work on the EU Directives on access to information and public participation implementing the Aarhus Convention will continue in 2015 with the new Commission and Parliament in place. It was initially expected that the Commission would come forward with a new proposal for a directive on access to justice before the end of 2014 but it did not happen under Barroso II and the approach of the Juncker Commission on environmental matters makes this now highly unlikely. In any case, the EEB will continue its advocacy in this area, emphasising the role that access to justice can play in supporting better implementation and enforcement of environmental law.

The EEB will closely monitor the appeal before the European Court of Justice against the finding by the General Court that the EU regulation implementing the Aarhus Convention at the level of the EU institutions fails to adequately transpose the requirements of the Convention. Irrespective of the outcome, we will continue to press for the strengthening of the regulation, including if necessary by supporting further legal action contesting its adequacy vis-à-vis the Convention, while at the same time more systematically using the regulation’s provisions in our everyday advocacy work.

We will also encourage our members to complain about and report back to the EEB on cases where the regulation is believed to have been violated. More generally, we will push for greater transparency in the EU institutions. Finally, the EEB will continue to play an active role in the Advisory Board of the EU Aarhus Centre, which it has chaired since it was established in 2011 by ClientEarth.

Aarhus Convention in the wider Europe

In 2015, the EEB will continue to play a leading role in the NGO work in the further development and implementation of the Aarhus Convention by coordinating the European ECO Forum input into the Convention processes focussing also on the outcomes of the Meeting of Parties to the Aarhus Convention (MOP). This work will also include the Protocol on Pollutant Release and Transfer Registers, as well as the Protocol on Strategic Environmental Assessment to the Espoo Convention. We will continue our work on the compliance mechanism under the Aarhus Convention as well as promotion of the Convention and Principle 10 of the 1992 Rio Declaration at the global level through involvement in the project “Building Bridges between the regions” and the next Eye on Earth Summit in Abu Dhabi (2015).

MEMBERSHIP AND ORGANISATIONAL DEVELOPMENT

In 2015, the EEB plans to focus on strengthening its membership network and staff capacity and to further enhance its political effectiveness at the same time as strengthening its communication and outreach activities. It will also aim to establish a stronger financial base for all of its activities, as described in the following sections.

Consolidating and expanding the EEB network and working with members

In 2015, the EEB will further invest in the development of its membership network and in strengthening its
working relationship with its members. Capacity building events will continue to play a role but will have a stronger focus on development of practical EU lobbying skills. Four such events are envisaged for 2015 if funding is available, including two pre-Presidency meetings, one in Luxembourg and one in the Netherlands.

A more systematic assessment of the needs of national NGOs was made in 2014 in order to develop national tailor-made packages which could extend beyond one-off events. The EEB intends to transform the results into action in 2015. The EEB office will continue to provide advice and support to individual members upon request. The EEB will encourage close cooperation of Board members with their national members. With the support of its Board members it will also encourage more active participation in one or more of the many working groups.

Efforts to attract more members and make membership as accessible as possible will be further explored. Where feasible and on relevant topics, the EEB staff will participate in and support members’ activities. Board members will be encouraged to be involved in these efforts.

Political impact

In 2015, the EEB will continue to play a leading role in articulating environment concerns in the debate on EU policies and countering attempts to erode environmental protection measures. To achieve this, we will continue to focus on the three principal EU institutions, in particular working closely with Presidencies. During 2015, it will be a priority to establish close relations at an early stage with the new Commission and Parliament. We will continue to work with others in partnerships, coalitions and networks to maximise our impact.

Financial consolidation

With the economic crisis squeezing the budgets of many of the EEB’s traditional donors, increased efforts will be needed to explore new sources of funding, with a particular focus on deepening partnerships with foundations.

Staff

Staff numbers grew significantly in 2013 and 2014, in response to both needs and opportunities. Some further but more limited expansion is envisaged for 2015, subject to the availability of funding, both to address certain important policy areas and to continue the process of organizational strengthening. Aside from quantitative development, staff capacity will be enhanced qualitatively by sharing skills, experience and expertise already existing within the EEB staff, and by bringing in professional trainers for specific skills and needs.

Communicating with key stakeholders and the wider public

In 2015, the EEB will continue to publish its quarterly newsletter Metamorphosis in which it comments on major policy developments, gives updates from the campaigning front and puts members’ activities in the focus. The Global Policies and Sustainability Unit publishes every month the newsletter “The Switch”, going out to 2,000 subscribers worldwide. The EEB will continue to maintain the EJOLT project’s website, publish blogs and reports, and use other means to publicise its activities, including via Facebook (3400 likes) and Twitter 3300 followers).

The EEB will explore the possibility of a meeting of EEB member organisations’ press officers or other staff responsible for communications to exchange information on good practices and build skills and capacity in this area.

Last but not least, the EEB will carry out a comprehensive review of its communication strategy during 2015 and update it as necessary.
### BUDGET 2015

#### A. General Costs

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<td>3. Office supplies</td>
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<td>7. Miscellaneous</td>
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**Sub-Total - A. - General Costs**

368,065

#### B. Salary Costs

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<td>7. Special Campaigns</td>
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<tr>
<td>8. Volunteers and Temporary Staff</td>
<td>19,200</td>
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<tr>
<td>9. Other personnel costs</td>
<td>48,197</td>
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</tbody>
</table>

**Sub-Total - B. - Salary Costs**

2,034,946

#### C. Activities*

<table>
<thead>
<tr>
<th>Item</th>
<th>Amount</th>
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</thead>
<tbody>
<tr>
<td>1.a. 7th Environmental Action Plan (7EAP)</td>
<td>1,000</td>
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<tr>
<td>1.b. Europe 2020</td>
<td>1,000</td>
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<tr>
<td>1.c. Sustainable Development Goals &amp; Sustainable Development Strategy (SDS)</td>
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<tr>
<td>1.d. Develop a paper on SDG governance in Europe and policy coherence</td>
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<tr>
<td>1.e. Fiscal Reform</td>
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<tr>
<td>1.f. Better Regulation</td>
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</tr>
<tr>
<td>2.a. Climate and energy</td>
<td>-</td>
</tr>
<tr>
<td>2.c. Ecodesign Directive and Energy Label Regulation implementation and revision</td>
<td>22,600</td>
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<tr>
<td>2.d. Biofuels</td>
<td>8,000</td>
</tr>
<tr>
<td>2.e. Energy Infrastructure</td>
<td>-</td>
</tr>
<tr>
<td>2.f. Biomass</td>
<td>700</td>
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<tr>
<td>2.g. Unconventional fossil fuels</td>
<td>-</td>
</tr>
<tr>
<td>2.h. Nuclear</td>
<td>1,000</td>
</tr>
<tr>
<td>3.a. Biodiversity Strategy</td>
<td>11,400</td>
</tr>
<tr>
<td>3.b. Natura 2000 evaluation</td>
<td>-</td>
</tr>
<tr>
<td>3.c. No net loss initiative</td>
<td>-</td>
</tr>
<tr>
<td>3.d. Invasive Alien Species</td>
<td>-</td>
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<tr>
<td>3.e. Legislative instrument on Invasive Alien Species</td>
<td>-</td>
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<tr>
<td>3.f. Soil</td>
<td>6,200</td>
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<tr>
<td>3.g. Sustainable agriculture</td>
<td>11,400</td>
</tr>
<tr>
<td>3.h. Genetically Modified Organisms (GMOs)</td>
<td>-</td>
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</tbody>
</table>

* The costs indicated in Section C do not include the salary costs linked to the field of activity, which are included in Section B.
### EEB Work Programme & Budget 2015

<table>
<thead>
<tr>
<th>4.a.</th>
<th>REACH Implementation</th>
<th>46,150</th>
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<tr>
<td>4.b.</td>
<td>EU regulation of nano materials</td>
<td>10,700</td>
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<td>4.c.</td>
<td>Air - ambient air quality and NEC revision</td>
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<td>4.d.</td>
<td>Air - Medium Scale Combustion plants</td>
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<td>4.e.</td>
<td>Environmental Noise Directive</td>
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<td>4.f.</td>
<td>EU Mercury Strategy revision</td>
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<td>4.g.</td>
<td>Mercury ‘Minamata’ Treaty Implementation</td>
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<td>4.h.</td>
<td>Industrial Emissions Directive</td>
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<td>5.a.</td>
<td>Water Framework Directive</td>
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<td>5.b.</td>
<td>Priority Substances Directive</td>
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<td>5.c.</td>
<td>New instrument on water reuse</td>
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<td>5.d.</td>
<td>Marine Protection</td>
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<td>6.a.</td>
<td>Resource Efficiency Roadmap</td>
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<td>6.b.</td>
<td>Waste Framework Directive revision</td>
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<td>6.c.</td>
<td>Revision of the Packaging and Packaging Waste Directives (P&amp;PWD)</td>
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<td>6.d.</td>
<td>Revision of the Landfill Directive</td>
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<td>6.e.</td>
<td>Building the single market for green products</td>
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<td>6.f.</td>
<td>Ecolabel</td>
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<td>6.g.</td>
<td>Green Public Procurement</td>
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<td>7.a.</td>
<td>Effective Enforcement of EU legislation and policies</td>
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<td>7.b.</td>
<td>Better Enforcement-New tools and complaints handling</td>
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<td>7.c.</td>
<td>Environmental inspections</td>
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<td>7.d.</td>
<td>Environmental Impact Assessment (EIA)</td>
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<td>7.e.</td>
<td>Environmental Liability Directive (ELD)</td>
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<td>7.f.</td>
<td>Environmental Crime Directive (ECD)</td>
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<td>8.a.</td>
<td>Global environment and sustainable development agenda</td>
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<td>8.b.</td>
<td>Pan-European outreach</td>
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<td>8.c.</td>
<td>Enlargement, European Neighbourhood Policy (ENP) and Eastern Partnership</td>
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<td>8.d.</td>
<td>SCP European focal point</td>
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<td>8.e.</td>
<td>Organisation for Economic Cooperation and Development (OECD)</td>
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<td>8.f.</td>
<td>Mediterranean</td>
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<td>8.g.</td>
<td>EU-US Trade negotiations</td>
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<td>9.a.</td>
<td>Aarhus Directives and Regulation – information, participation and justice in the EU</td>
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<td>9.b.</td>
<td>Aarhus Convention in the wider Europe</td>
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<td>10.</td>
<td>Green 10, Spring Alliance</td>
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<td>11.a.</td>
<td>Consolidating and expanding the EEB network and working with members</td>
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<td>11.a.i.</td>
<td>- Working with the Presidencies</td>
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<td>11.a.ii.</td>
<td>- Annual General Assembly</td>
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<td>11.b.</td>
<td>Political impact</td>
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<td>11.c.</td>
<td>Communicating with key stakeholders and the wider public</td>
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<td>11.d.</td>
<td>Financial consolidation</td>
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<td>11.e.</td>
<td>Staff</td>
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<tr>
<td>11.f.</td>
<td>Horizontal communications development</td>
<td>30,000</td>
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</tbody>
</table>

**Sub-Total - C.** 791,204

| D. | Allocation to Working Capital | 120,000 |

**TOTAL EXPENDITURE** 3,314,215
The European Environmental Bureau (EEB) is a federation of more than 140 environmental citizens’ organisations based in most EU Member States, most candidate and potential candidate countries as well as in a few neighbouring countries. These organisations range from local and national, to European and international. The EEB’s aim is to protect and improve the environment by influencing EU policy, promoting sustainable development objectives and ensuring that Europe’s citizens can play a part in achieving these goals. The EEB stands for environmental justice and participatory democracy. Our office in Brussels was established in 1974 to provide a focal point for our members to influence, monitor and respond to the EU’s emerging environmental policy.